

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**ELANDER WOODALL, Individually and on  
Behalf of All Others Similarly Situated**

**PLAINTIFF**

vs. No. 1:23-v-459

**EVERGREEN PACKAGING LLC,  
and PACTIC EVERGREEN INC.**

**DEFENDANTS**

**PLAINTIFF'S UNOPPOSED MOTION FOR COSTS AND ATTORNEYS' FEES**

Plaintiff Elander Woodall, individually and on behalf of all others similarly situated, by and through her attorneys of the Sanford Law Firm, PLLC, for her Unopposed Motion for Costs and Attorneys' Fees, states as follows:

1. Plaintiff filed this case on January 15, 2023 pursuant to the Fair Labor Standards Act (FLSA), 29 U.S.C. § 201 *et seq*, to recover unpaid wages.
2. This case progressed through discovery efforts including written discovery requests, as well as some motions practice, and ultimately the parties reached a settlement on liability. The parties also agreed that Plaintiff would submit a request for fees and that Defendant would not oppose that request.
3. The parties submitted their proposed settlement to the Court on April 21 (ECF No. 93).
4. Accordingly, Plaintiff files the current Motion requesting an award of costs and attorneys' fees pursuant to the FLSA, 29 U.S.C. § 216(b).

5. As shown on the Billing Spreadsheet attached hereto as Exhibit 1, Plaintiff's counsel billed 177.4 hours for a total of \$44,287.50. As shown in detail on Plaintiff's Costs Invoice (Exhibit 3), Plaintiff also incurred \$4,755.23 in costs other than attorneys' fees during litigation.

6. Plaintiff requests \$42,000.00 in attorneys' fees and costs incurred through April 21, 2025, related to the successful litigation of Plaintiff's claims. Plaintiff categorized and summarized billing by attorney and category of work for the Court's convenience in reviewing this request.

7. In support of this Motion, Plaintiffs attach hereto and incorporate herein the following exhibits:

- Ex. 1 Billing Spreadsheet;
- Ex. 2 Declaration of Attorney Josh Sanford;
- Ex. 3 Declaration of Attorney Doug Werman; and
- Ex. 4 Costs Invoice

8. This Motion is supported by a contemporaneous Memorandum Brief.

WHEREFORE, Plaintiff respectfully requests that this Motion for Costs and Attorneys' Fees be granted in its entirety, that the Court award Plaintiff fees and costs in the amount of \$42,000.00, and for all other just and equitable relief to which Plaintiff may be entitled.

Respectfully submitted,

**ELANDER WOODALL, Individually and  
on Behalf of All Others Similarly  
Situated, PLAINTIFF**

SANFORD LAW FIRM, PLLC  
Kirkpatrick Plaza  
10800 Financial Centre Pkwy, Suite 510  
Little Rock, Arkansas 72211  
Telephone: (800) 615-4946  
Facsimile: (888) 787-2040

Sean Short  
Ark. Bar No. 2015079  
sean@sanfordlawfirm.com

Josh Sanford  
Ark. Bar No. 2001037  
josh@sanfordlawfirm.com